

EXHIBIT "B"

STATE OF TEXAS

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COUNTY OF TRAVIS

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Affidavit of Dawn Glasgow

Before me, the undersigned notary, on this day personally appeared Dawn Glasgow, a person whose identity is known to me. After I administered an oath to her, upon her oath, she said:

1. "My name is Dawn Glasgow. I am capable of making this affidavit. The facts stated in this affidavit are within my personal knowledge and are true and correct.

2. I am the administrative executive for Austin Montessori School ("AMS"), which is located in Austin, Texas.

3. On July 26, 2012, I was deposed as AMS's corporate representative by plaintiff Caroline Clark's counsel. During the week of July 16, 2012, I requested from AMS's former payroll service, ADP, AMS's payroll records from 2009 and 2010. I did not receive ADP's response to my request because the request was intercepted by AMS's spam filter; thus, it was not delivered to its intended recipient. On July 24, 2012, I followed up with ADP regarding my request. ADP employee Mary Ann Cantu assisted me. After considerable delay, Ms. Cantu faxed me the requested records that day; however, they very difficult to read and they were broken down by quarter, not by pay period. I called Ms. Cantu immediately and requested that she email me the records, which she did after further delay. However, they were incomplete.

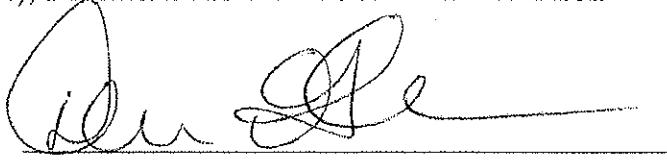
4. I was deposed two days later, on July 26. During my deposition, counsel for AMS produced to Ms. Clark's counsel the records ADP had given to us and he noted that the records were incomplete. During my deposition, I was prepared and able to testify as to who AMS employed in 2009 and 2010. In fact, Mrs. Clark's counsel named all of the individuals listed on the payroll records and I testified whether the individual was an AMS employee. In testifying that I was unable to name all of AMS's employees in 2009 and 2010, I simply meant that I did not memorize the names of all the employees. While reviewing AMS's payroll records, I was certainly able to and did in fact testify about each of AMS's employees in 2009 and 2010.

5. On July 27, I again called ADP to request complete copies of AMS's payroll records for 2009 and 2010. ADP employee Jennifer Valdez assisted me. Three days later, on July 30, Ms. Valdez sent me the requested records, which were broken down by each employee paid in 2009 and 2010. Ms. Valdez informed me that the records broken down by each pay period were not available.

6. On August 6, per request by AMS's counsel, I again called ADP to request the payroll records for 2009 and 2010 broken down by pay period. ADP employee Alicia Gabriel told me she would be able to get the requested records to me but that it would

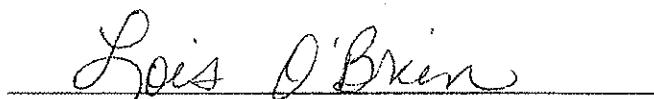
take some time due to her having to compile the data to produce the records as requested.

7. On August 7 at 6:18 pm, Ms. Gabriel emailed me the requested records. Early the following morning (August 8), I emailed the records to AMS's counsel."



Dawn Glasgow

Sworn to and subscribed before me by Dawn Glasgow on this 20th day of August, 2012.



Lois O'Brien
Notary Public in and for the State of Texas